## IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS DALLAS DIVISION

| SHANE GALITSKI, RICHARD               | §        |                  |
|---------------------------------------|----------|------------------|
| TALIAFERRO and                        | §        |                  |
| BRIAN NEWBOLD, Individually           | §        |                  |
| and on behalf of All Others Similarly | §        |                  |
| Situated,                             | §        |                  |
|                                       | §        | CIVIL ACTION NO. |
| Plaintiffs,                           | §        |                  |
|                                       | §        | 3:12-CV-4782-D   |
| <b>v.</b>                             | §        |                  |
|                                       | §        |                  |
| SAMSUNG TELECOMMUNICATIONS            | §        |                  |
| AMERICA, LLC,                         | §        |                  |
|                                       | §        |                  |
| Defendant.                            | <b>§</b> |                  |
|                                       |          |                  |

# DEFENDANT'S THIRD UNOPPOSED MOTION TO EXTEND TIME TO RESPOND TO PLAINTIFFS' MOTION TO COMPEL

#### TO THE COURT:

Defendant Samsung Telecommunications America, LLC ("STA") files its Third Unopposed Motion to Extend the Deadline to Respond to Plaintiffs' Motion to Compel STA to Comply with Topic 12 of Plaintiffs' Amended Notice of F.R.C.P. Rule 30(b)(6) Deposition [Docket No. 108], and in support thereof, STA respectfully shows the Court as follows:

- 1. On April 9, 2014, Plaintiffs filed Plaintiffs' Motion to Compel STA to Comply with Topic 12 of Plaintiffs' Amended Notice of F.R.C.P. Rule 30(b)(6) Deposition.
- 2. STA's original deadline to respond was April 30, 2014. STA previously filed two motions to request that the Court extend its deadline to respond through May 14, 2014.
- 3. STA now requests an additional seven days to file its response, until May 21, 2014.

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4. As indicated in the Certificate of Conference below, Plaintiffs do not oppose the

relief requested by this motion.

5. This extension is sought for good cause. Counsel for Defendant STA is still in the

process of attempting to resolve the issues presented by Plaintiffs' motion to compel and believes

that additional time will likely facilitate resolution of the issues presented by Plaintiffs' motion

without the necessity of court intervention. Since the last requested extension, the parties have

made significant progress identifying the specific information sought by Plaintiffs; and STA

believes that the parties will reach resolution within the additional time requested.

6. Accordingly, pursuant to Federal Rule of Civil Procedure 6(b)(1)(A), STA

respectfully requests that this Court extend the deadline for STA to file its response to Plaintiffs'

Motion to Compel STA to Comply with Topic 12 of Plaintiffs' Amended Notice of F.R.C.P.

Rule 30(b)(6) Deposition until May 21, 2014.

Date: May 14, 2014

Respectfully submitted,

/s/ John Volney

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ATTORNEYS FOR DEFENDANT SAMSUNG TELECOMMUNICATIONS

**AMERICA, LLC** 

## **CERTIFICATE OF CONFERENCE**

I hereby certify that I conferred with Plaintiffs' counsel regarding the matters at issue in this motion. During that conference, counsel indicated that Plaintiffs are not opposed to the relief sought herein.

| Certified to on May 14, 2014, by |  |
|----------------------------------|--|
|                                  | <u>/s/Alan Dabdoub</u><br>Alan Dabdoub |

## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the above and foregoing document has been served via the Court's ECF system on May 14, 2014.

| /s/ John Volney |  |
|-----------------|--|
| John Volney     |  |